

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION**

Pacific Capro Industries d/b/a Capro
Industries,

Plaintiff,

vs.

Global Advantage Distribution Warehouse,
LLC d/b/a Global Advantage Distribution
Warehouse, Inc., Global Advantage
Distribution, Inc., Global Advantage Holding,
LLC, Matthew J. Crawley, Kevin C. Snow,
and Eric C. Gibson,

Defendants.

04:08-CV-4155-RBH

**PLAINTIFF'S MOTION FOR RELIEF,
PURSUANT TO RULE 60(b),
Fed. R. Civ. P.**

Plaintiff Pacific Capro Industries d/b/a Capro Industries ("Capro"), by and through the undersigned counsel, moves the Court for an Order pursuant to Rule 60(b) of the Federal Rules of Civil Procedure requesting opening of the Order of Default Judgment entered on January 20, 2011, against Defendants Global Advantage Distribution Warehouse, LLC d/b/a Global Advantage Distribution Warehouse, Inc., Global Advantage Distribution, Inc., Global Advantage Holding, LLC and Matthew J. Crawley and allowing its counsel to file a memorandum of law and affidavit of attorney's fees in support of its Unfair Trade Practices claim and claim for prejudgment interest for the Court's re-calculation of Plaintiff's actual damages. The requested relief should be granted based upon the mistake, inadvertence or excusable neglect of its counsel.

This Motion is supplemented by a memorandum of law filed contemporaneously herewith.

Respectfully submitted,

s/ Karl A. Folkens

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Florence, South Carolina